

The idea for AM stations being allowed to broadcast on FM Translators is a great idea, but I have some major concerns. I believe that AM stations that have decent coverage, especially at night will be granted the translators, and the small “stand alone” AM operators will be left out in the cold without one.

The FCC should establish some qualifications for an AM station to be allowed to licensed an FM Translator.

1. The AM daytimers (Class “D” stations) should be considered first. These are AM stations with no or little nighttime power (i.e. 2-10 watts at night, known as “flea powers”). Stations that are 50 KW, unlimited (Class “A” and “B”) time stations in a major or medium market should not qualify. The majority of those licensees have FM stations anyway, and if they are so concerned about the programming of the AM station receiving interference, they most likely own an FM station to rebroadcast the AM station’s programming.
2. In major and medium markets, there are quite a few “Class “B” stations with powers anywhere from 5 to 50 KW daytime, and various powers, 1 KW and above on directional patterns at night. These stations should be looked at on a “case by case” basis as I have mentioned in point #4 of my comments.
3. Class “C” AM’s should be looked at on a “case by case” basis. Class “C” stations, unlike a Class “D” station, a Class “C” station has 1000 watts daytime and nighttime, having larger coverage areas at night than a Class “D” stations with a pre-sunrise or post-sunset/nighttime power of 2 or 3 watts. Class “C” stations should be “Second in Line” for a FM Translator vs. the Class “D”, daytime station.
4. The FCC should assign an FM Frequency and Power for all Class “D” AM stations, just like what was done for AM stations when studies were done for Pre-Sunrise and Post-Sunset Powers. This will assure fairness to the Class “D”, AM daytime only stations or Class “D” stations with “flea powers” at night. I realize this would be a cost burden to the commission, but if this is not done properly, some Class “D” AM’s will get left out.
5. AM Class “D” stations should be given more priority than licensees of non-commercial FM religious outfits (i.e. Education Media Foundation, a.k.a. K-LOVE or Calvary Chapel of Twin Falls, Id) that are taking advantage of rebroadcasting an FM station, hundreds of miles away, that violates the current localism ideas of the FCC has taken into consideration over the past several months.

These qualifications are some suggestions that I felt should be taken in consideration before the commission approves a rule making on this issue.

In my honest opinion, we are now in an era where Class 'A' AM stations are not relied upon outside their markets for information. Their protected range needs to be reduced from 650 miles to 350 to 400 miles. I've mention this on occasion in many broadcast blog list and the only individuals that complains about this proposal is hobbyist, radio historians, and DX'er's, which I'm sure the FCC ignores for the most part. This would allow some Class "D" stations some relief during the early morning, early evening, and nighttime hours, if an FM Translator frequency is not available to the Class "D" station.

Class "D" Owners and Mangers have been threaten by these so called hobbyist and DX'ers and it's time the government puts a stop to the NRC (National Radio Club) and their member's antics.

We, the station owners of Class "D" daytime stations should be allow to press "Federal Criminal Charges" against DX'ers of the NRC, whom are making threats to station owners that are outside the station's city of license. The FCC allowing Class "D" station first priority for FM Translators should end some of this.

In closing, I feel the FCC Head Commissioners need to educate themselves about what is going on in the "Real World" around the country of how AM Radio is dying and that small AM stations having a chance to rebroadcast their signals on FM Translators would benefit these stations economically, keeping them from going dark, and threats (verbal & email) from hobbyist outside their markets, that do not count.

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